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March 7, 2024

Via ECF

Hon. Denise L. Cote
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *ACE Pictures, Inc. v. Valnet, Inc.*
Docket No: 1:24-cv-00130-DLC

Dear Judge Cote:

We are the attorneys for Plaintiff ACE Pictures, Inc. ("Plaintiff") in this matter. Pursuant to Section I(E) of Your Honor's Individual Practices, we write to respectfully request an adjournment of the initial conference date until at least 14 days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant's response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties' settlement discussions.

Defendant executed a waiver of service on January 12, 2024, setting April 11, 2024 as Defendant's deadline to answer the Complaint (ECF No. 10). The initial conference is currently set for March 15, 2024. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Renee J. Aragona
Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.
Mitchell Silberberg & Knupp LLP
Via email to lre@msk.com
Counsel for Defendant

*The conference is adjourned
to April 26 at 11:00 a.m.
Denise Cote
3/17/24*